

Marc M. Seltzer (54534)  
Steven G. Sklaver (237612)  
Oleg Elkhunovich (269238)  
Meng Xi (280099)  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067-6029  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150  
mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com  
oelkhunovich@susmangodfrey.com  
mxi@susmangodfrey.com

P. Ryan Burningham (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
rburningham@susmangodfrey.com

James Q. Taylor-Copeland (284743)  
TAYLOR-COPELAND LAW  
501 W. Broadway, Suite 800  
San Diego, CA 92101  
james@taylorcopelandlaw.com  
Telephone: (619) 400-4944  
Facsimile: (619) 566-4341

*Counsel for Lead Plaintiff Bradley Sostack*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

This Document Relates to:

All Actions

**LEAD PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
MATERIALS RELATING TO LEAD  
PLAINTIFF'S REPLY IN SUPPORT OF  
HIS MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND  
PRIVILEGE LOG**

Pursuant to Civil Local Rules 7-11 and 79-5(e), and §§ 7(C) and 7(D) of the parties' Stipulated Protective Order as Modified by the Court, ECF No. 120, Lead Plaintiff Bradley Sostack moves this Court to file under seal the following documents related to Lead Plaintiff's Reply in Support of His Motion to Compel Production of Documents and Privilege Log. Plaintiff seeks to seal portions of its brief and its accompanying declaration and exhibits based on confidentiality designations made by Defendants. Plaintiff takes no position concerning whether there is good cause to seal these documents.

<b>Documents to be Filed Under Seal</b>	<b>Line Nos. to be Redacted / Sealed in Full</b>
Portions of Lead Plaintiff's Reply in Support of His Motion to Compel Production of Documents and Privilege Log	6:15-17 6:25-28 7:1-5
Burningham Decl. Exhibit 1 (RPLI_00302981)	Sealed in Full
Burningham Decl. Exhibit 2 (RPLI_00302989)	Sealed in Full
Burningham Decl. Exhibit 3 (RPLI_00303004)	Sealed in Full
Burningham Decl. Exhibit 4 (RPLI_00303011)	Sealed in Full
Burningham Decl. Exhibit 5 (RPLI_00303032)	Sealed in Full

The documents above contain and describe information that has been designated by Defendants as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the parties' Stipulated Protective Order. *See* ECF No. 120 at §§ 2(B), 2(G). Pursuant to Civil L.R. 79-5(d)(1)(A)–(D), filed herewith are the following:

- (1) the Declaration of P. Ryan Burningham in support of this motion;
- (2) a proposed order;
- (3) unredacted versions of the documents listed above; and
- (4) a redacted version of the reply brief.

Plaintiff respectfully requests that, if the Court finds good cause, it enter the attached proposed order.

Dated: March 1, 2021

SUSMAN GODFREY L.L.P.

By: /s/ P. Ryan Burningham

Marc M. Seltzer (54534)  
Steven G. Sklaver (237612)  
Oleg Elkhunovich (269238)  
Meng Xi (280099)  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067-6029  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150  
mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com  
oelkhunovich@susmangodfrey.com  
mxi@susmangodfrey.com

P. Ryan Burningham (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
rburningham@susmangodfrey.com

James Q. Taylor-Copeland (284743)  
TAYLOR-COPELAND LAW  
501 W. Broadway, Suite 800  
San Diego, CA 92101  
james@taylorcopelandlaw.com  
Telephone: (619) 400-4944  
Facsimile: (619) 566-4341

*Counsel for Lead Plaintiff Bradley  
Sostack*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2021, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

/s/ *P. Ryan Burningham*

P. Ryan Burningham